

MCNAIR LAW FIRM, P.A.
ATTORNEYS AND COUNSELORS AT LAW

11th Floor, Bank of America Tower
Post Office Box 11390
1301 Gervais Street (29201)
COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE (803) 799-9800
FACSIMILE (803) 376-2219

January 17, 2005

Public Service Commission of South Carolina
Attn: Docketing Department
Post Office Box 11649
Columbia, South Carolina 29211

Re: Application of Symtelco, LLC for a Certificate of Public Convenience and
Necessity to Provide Local, Interexchange, Operator, Collect-only Inmate and
Payphone Telecommunications Services in the State of South Carolina
(SCPSC Docket No. 2004-334-C)

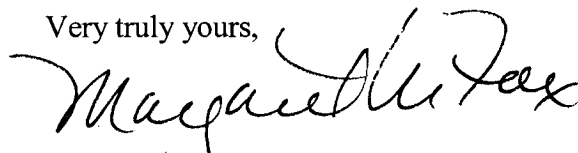
Dear Sir or Madam:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,


Margaret M. Fox

Enclosures

cc: John J. Pringle, Jr., Esquire

ORS-1
SA-1

ACCEPTED
Legal 1-18-05 JLB

INTERVIEW
1 DBW

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2004-334-C

Re: Application of Symtelco, LLC for a Certificate)
of Public Convenience and Necessity to Provide)
Local, Interexchange, Operator, Collect-only)
Inmate and Payphone Telecommunications)
Services in the State of South Carolina)
_____)

**PETITION TO
INTERVENE**

In response to the Commission's Notice of the Filing of the Application of Symtelco, LLC for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.


OK
OK

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: 

Attorneys for Intervenor South Carolina
Telephone Coalition

January 17, 2005

Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

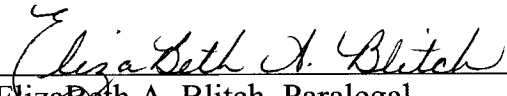
Docket No. 2004-334-C

Re: Application of Symtelco, LLC for a Certificate)
of Public Convenience and Necessity to Provide)
Local, Interexchange, Operator, Collect-only)
Inmate and Payphone Telecommunications)
Services in the State of South Carolina)
_____)

**CERTIFICATE OF
SERVICE**

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

John J. Pringle, Jr., Esquire
Ellis Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, South Carolina 29202-2285


ElizaBeth A. Blitch, Paralegal
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

January 17, 2005

Columbia, South Carolina